

EXHIBIT B

DURIE TANGRI LLP
Michael H. Page (Cal. Bar No. 154913)
mpage@durietangri.com
217 Leidesdorff Street
San Francisco, California, 94111
+1 (415) 362-6666
+1 (415) 236-6300 facsimile
Attorneys for Defendant Orange, S.A.

FOLEY HOAG LLP
Daniel Schimmel (*pro hac vice*)
dschimmel@foleyhoag.com
1540 Broadway, 23rd Floor
New York, New York, 10036
+1 (646) 927-5500
+1 (646) 927-5599 facsimile
Attorneys for Defendants

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

TELESOCIAL INC.,

Plaintiff,

v.

ORANGE S.A., a French Corporation;
ANNE BENRIKHI, an individual;
DIMITRI DELMAS, an individual;
OLIVIER GODINIAUX, an individual;
GUILLAUME GUIMOND, an individual;
FABRICE PETESCH, an individual;
JACQUES VIEL, an individual;
BARBARA BOBILLIER, an individual;
BENOIT AMET, an individual;
THOMAS LESENECHAL, an individual;
FLORIAN DE SA, an individual;
ANTOINE LECOUTTEUX, an individual;
and SYLVAIN JAUDRY, an individual,

Defendants.

CASE NO. 3:14-CV-3985-JD

**REQUEST FOR INTERNATIONAL
JUDICIAL ASSISTANCE PURSUANT TO
CHAPTER II OF THE HAGUE
CONVENTION OF 18 MARCH 1970 ON
THE TAKING OF EVIDENCE ABROAD
IN CIVIL OR COMMERCIAL MATTERS**

A request is hereby made by the United States District Court for the Northern District of California to the Ministère de la Justice, Direction des Affaires Civiles et du Sceau, Bureau de l'entraide civile et commercial international (D3), 13, Place Vendôme, 75042 Paris Cedex 01, France, for assistance in the above-captioned action in obtaining the deposition testimony of individuals located in France. This request is made pursuant to Chapter II of the Hague Convention of 18 March 1970 on the Taking of Evidence in Civil or Commercial Matters (the "Hague Convention"):

1. Sender	The Honorable James Donato United States District Judge United States District Court Northern District of California San Francisco Courthouse, 19th Fl., CR 11 450 Golden Gate Avenue San Francisco, CA 94102 United States of America
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2. Central Authority of the Requested State	Ministère de la Justice Direction des Affaires Civiles et du Sceau Bureau de l'entraide civile et commercial international (D3) 13, Place Vendome 75042 Paris Cedex 01 France
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3. Person to whom the executed request is to be returned	Michael Page Durie Tangri LLP 217 Leidesdorff Street San Francisco, California, 94111 This Court asks that the executed request be returned to Mr. Page as soon as possible.
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4. In conformity with Chapter II, Article 17 of the Convention, the undersigned Applicant has the honor to submit the following request:

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2 5(a). Requesting judicial authority United States District Court
3 Northern District of California
4 San Francisco Courthouse, 19th Fl., CR 11
5 450 Golden Gate Avenue
6 San Francisco, CA 94102
7 United States of America

8
9 5(b). To the competent authority of The Republic of France

10 6. The names and addresses of the parties to the
11 proceedings and their representatives

12 6(a). Plaintiffs Telesocial Inc.
13 5 Funston Ave.
14 San Francisco, CA 94129

15 Represented by:

16 Benjamin L. Singer
17 Renee B. Bea
18 Douglas S. Tilley
19 singer / bea LLP
20 601 Montgomery Street, Suite 1950
21 San Francisco, California, 94111
22 United States of America

23 -and-

24 Todd Briggs
25 Quinn Emanuel Urquhart & Sullivan, LLP
26 555 Twin Dolphin Drive, 5th Floor
27 Redwood Shores, CA 94065
28 United States of America

24 6(b) Defendant Orange, S.A.
25 78 Rue Olivier de Serres,
26 75015 Paris,
27 France

28 Represented by:

Michael H. Page
Durie Tangri LLP

217 Leidesdorff Street
San Francisco, California, 94111
United States of America

-and-

Daniel Schimmel
Foley Hoag LLP
1177 Avenue of the Americas
New York, New York, 10036
United States of America

7. The nature and the purpose of the proceedings
and summary of the facts

Plaintiff Telesocial Inc. (“Telesocial”) is a tech start-up founded in 2008 which developed a software application known as “Call Friends.”

Defendant Orange, S.A. is a French telecommunications provider; the individually-named defendants are persons associated with Orange (“Orange”).

In 2012, Orange and Telesocial began discussions about a possible business deal involving the “Call Friends” application. The parties never reached agreement as to an ongoing business relationship. Telesocial filed the Complaint initiating the instant action on September 2, 2014, which it amended on December 15, 2014 (the “Amended Complaint”). In its Amended Complaint, Telesocial alleged that Orange and the various individual defendants improperly obtained access to and copied Telesocial’s technology, and other related claims. By its answer of May 12, 2015, amended on June 19, 2015, Orange denied that it used, copied, or reverse-engineered Telesocial’s technology, in addition to other defenses. Discovery is ongoing. On May 6, 2016, the District Court entered the Second Amended Scheduling Order, providing a fact discovery deadline of September 30, 2016.

8. Evidence to be obtained

The parties seek permission to take the oral deposition testimony of individuals residing in France.

- 1 9. Identity and address of person to be Examined Benoit Amet, Anne Benrikhi, Laurent Castaignet,
2 Guilhem Caumel, Dimitri Delmas, Emmanuelle
3 Desodt, Olivier Godiniaux, Jonathan Gourdin,
4 Guillaume Guimond, Bertrand Guisnet, Antoine
5 Lecoutteux, Catherine Le Drogo Ferrari, Frédéric
6 Martelli, Xavier Perret, Fabrice Petesch, and,
7 Philippe Streiff.
- 8 10. Subject matter about which the person is to be
9 examined Each individual's knowledge concerning the claims
10 in Telesocial's Amended Complaint and Orange's
11 defenses thereto.
- 12 11. The name of any of the parties, or their
13 representatives, who plan to attend the deposition Benjamin Singer, Renee Bea and others from
14 Singer/Bea LLP, and Todd Briggs and others from
15 Quinn Emmanuel, on behalf of Telesocial, and
16 Daniel Schimmel and Anthony Mirenda and others
17 from Foley Hoag LLP, on behalf of Orange.
- 18 12. The names, address, and telephone numbers of
19 the stenographer and interpreter who have been
20 selected, if any
- 21 13. Whether the parties to the case have consented The parties have consented to the depositions.
22 to the deposition, and if not, the reasons for any
23 objection which has been made
- 24 14. A suggested date for the depositions, if there is Various dates between June 22 - September 22,
25 a preference 2016
- 26 15. Any requirement that the evidence is to be All evidence shall be given under oath, under
27 given on oath or affirmation, and any special form penalty of perjury.
28 to be used

16. Any special methods or procedures to be followed

The Commissioner, the parties' representatives, attorneys, interpreters, and a stenographer and a videographer will be permitted to be present during the deposition; the stenographer will be permitted to record verbatim the examination; attorneys for the parties will conduct the examination; witness examinations by attorneys for the parties will be conducted orally. The parties request that transcription of the deposition be in English.

17. Specification of privilege or duty to refuse to give evidence under the law of the State or origin

Witnesses may refuse to answer a question where doing so would disclose a privileged communication with counsel or where doing so would disclose work performed under the direction of an attorney.

18. Authority appointing Commissioner, pending approval of the Ministère de la Justice

United States District Court
Northern District of California
San Francisco Courthouse, 19th Fl., CR 11
450 Golden Gate Avenue
San Francisco, CA 94102
United States of America

19. Commissioner

Shelle Higgins, CSR 10455, CLVS or others from
European Court Reporting
18 Chemin de la Croix Saint Jerome
77123 Noisy-sur-Ecole
France
Tel. 33 (0)977 197 098

20. The costs of the Hague Convention proceedings, including, without limitation, the fees of the Commissioner and the translation fees or costs, will be borne by

The party identified in 6(a), but each party will be responsible for the fees and expenses, if any, of its own attorneys relating to the Hague Convention proceedings.

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4 HONORABLE JAMES DONATO
5 UNITED STATES DISTRICT JUDGE
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